IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

GEORGE HENRY SIMEONE

fdba George Simeone's 100 Hour Mega : CASE NO. 1:17-bk-04682

Sale

Debtor

:

SPECIALIZED LOAN SERVICING, LLC
AS SERVICER FOR THE BANK OF NEW
YORK MELLON F/K/A THE BANK OF
NEW YORK AS TRUSTEE FOR THE
CERTIFICATEHOLDERS OF THE
CWABS, INC. ASSET-BACKED
CERTIFICATES, SERIES 2006-18

Movant

:

GEORGE HENRY SIMEONE fdba George Simeone's 100 Hour Mega Sale

Respondent

ANSWER TO MOTION FOR RELIEF FROM STAY

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Admitted in part; however, denied to the extent that the Debtor is without sufficient information, such as a pay off statement, to form an opinion as to the exact payoff.

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- 7. Admitted.
- 8. The Debtor is without sufficient information, such as a pay off statement, to form an opinion as to the exact payoff and therefore this is denied.

- 9. Admitted.
- 10. The Debtor is reviewing his records but does not believe that he is that far behind. He will provide proof of any payments not credited and cure the remaining arrears within a reasonable time.
- 11. Admitted.
- 12. Denied. See response to paragraph 10.
- 13. Denied. See response to paragraph 10.
- 14. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

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